



INTEROFFICE COMMUNICATION

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MEMO TO: Armando Matus  
FROM: Ken Perkins *KAP*  
SUBJECT: LYNDEN FACILITY

Date: 9/12/94

In follow up to your August 21, 1994, memo regarding gravel work and upgrades to the storm water conveyance system, I recently conducted an onsite evaluation of the property at the request of Tom Lee. The primary focus of the evaluation was to response to a letter from Latham & Watkins, an attorney firm representing the Morf Family Trust. During my visit, I conducted a comprehensive review of all previous environmental site assessment reports to determine if any site remediation work was needed as outlined in McLaren/Hart's January 14, 1994 Environmental Site Assessment (ESA) report.

The following is a summary of my findings have been provided to Tom Lee. This information is also being provided to you to help guide you in your efforts in upgrading the facility's stormwater system.

SUMMARY OF FINDINGS

In May and June 1992, PBS Environmental performed a Phase I and Phase II Environmental Site Assessment (ESA) at the property and identified eight (8) environmental concerns regarding possible soil and ground water contamination. In April 1993, a follow up ESA was performed by McLaren Hart. In their April 29, 1993 and January 14, 1994 reports, ten (10) additional environmental concerns were identified and described.

**1. Underground Waste Oil Tank:**

Both reports state that operating permits for the waste oil tank had not been obtain from the Department of Environmental Quality (DEQ). As of this date, the tank has been precision tested for leaks and the appropriate operating permits have been issued by DEQ. I recommend that we continue operating the waste oil tank in accordance with the permit and DEQ requirements. All regulatory requirements have been meet and, therefore, no further action is required regarding this issue.

The petroleum staining reported on page 4 of McLaren/Hart's ESA report was inspected. There is presently no physical evidence that any soil surrounding the infill pipe and vent has been permanently stain or contaminated by waste oil or any other petroleum product.

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## 2. Staining Adjacent to a Transformer

McLaren/Hart's ESA report states that no detectable levels of PCBs were found during soil sampling. As for the petroleum stain observed near the transformer, there is currently no physical evidence that the concrete or asphalt that surrounds the transformers has ever been stained by petroleum products or waste. No further investigative work is being recommended.

## 3. Waste and Surface Water Discharge

### Waste Water Discharge

The Lynden Farm processing facility currently has valid operating permit to discharge wastewater into the City of Portland's wastewater treatment plant. No further action is required concerning this issue.

### Storm Waste Discharge

A stormwater discharge permit has been obtained from DEQ and a Stormwater Management Plan has been developed for the facility. There is currently no physical evidence (soil staining, odor, dead vegetation) that a petroleum release had occurred in the areas identified in the report.

Don Easley and I have decided to collect soil samples in these areas to determine whether any environmental contamination would warrant cleanup. We will remove any contaminated soil that exceeds the State's 100 ppm diesel standard and bioremediate the contamination. Once the soil has been removed (if any), the area can be leveled and re-graveled.

## 4. Hazardous Materials Storage (Above Ground)

### Barrel Storage Area

I recommend that we collect soil samples in the former "Barrel Storage Area" and remove any contaminated soil that exceeds Oregon's 100 ppm TPH-D (total petroleum hydrocarbon - diesel) cleanup criteria. No chlorinated hydrocarbons were detected during either ESA. Storage of chemicals should no longer be carried out in this area.

### Pipe Trench in Boiler Room

The concrete-lined pipe trench in the boiler room was designed to prevent oil leaks from contaminating soil and/or groundwater beneath the building. As reported in McLaren/Harts' ESA Report, the contaminated "sediment" is not considered "soil" and is not regulated by state or federal cleanup standards. Absorbent

material should be placed in the pipe trench so that if a "significant" release should occur, the contamination can be easily removed and treated. No further investigative work is being recommended.

#### Chemical Storage Room

The pH values for soil samples collected in the "former" chemical storage room are within normal, safe pH ranges. No further investigative work is required regarding this issue.

#### Hazardous Material Storage near Truck Maintenance Shop

Storage of chemicals should not be allowed in this area. There is presently no physical evidence of soil contamination in this area. No further investigative work or regulatory action is required regarding this issue.

#### 5. Dredged Fill Materials

Both ESA reports indicate that there is no evidence of environmental contamination in the dredged fill material. No further action is required.

#### 6. Potential Asbestos Containing Building Materials

If any major building modifications are made, all potential asbestos-containing material will be analyzed for friable asbestos and handled in accordance with established procedures. No further action required regarding this issue.

#### 7. Former 8,000-gallon Underground Gasoline Tank

According to DEQ underground storage tank records, the former 8,000 gallon gasoline tank was removed and officially decommissioned on September 15, 1990. No further action required regarding this issue.

#### 8. Petroleum Release Adjacent to Storm Drain at Truck Parking Area

In accordance with the Storm Water Management plan for the facility, all petroleum products should be stored in areas that would prevent accidental releases from reaching any storm water conveyance system. No further investigative work or regulatory action is required regarding this issue.

**9. Petroleum Releases in the Engine Room**

The entire surface area of the floor in the Engine Room is lined with concrete and was designed to prevent oil leaks from contaminating soil and/or groundwater. Since the contaminated "sediment" is not considered soil, it is not regulated by state or federal cleanup standards. Absorbent material should be placed in the channel so that if a significant release should occur, the lubricating oil can be easily removed and treated. No further investigative work or regulatory action is required regarding this issue.

**10. Oil/Water Separator Adjacent to the Engine Room**

The area surrounding the oil/water separator is comprised of concrete and asphalt which is designed to prevent petroleum products from soaking into the underlining soil. The previously observed oil stains on the surface of the asphalt and concrete do not fall under any federal or state regulatory cleanup rules. No further investigative work or regulatory action is required regarding this issue.

**11. Petroleum Releases and Floor Drains in Maintenance Shop**

If any petroleum spills had occurred in 1992, these spills have been cleanup. The drains were inspected on September 6, 1994 and no evidence of oil or other chemical contamination were observed. Since the entire floor area in the Maintenance Shop is comprised of impervious concrete and the floor drains are connected to the sanitary sewer, no environmental contamination to soil or groundwater could have occurred. No further investigative work or regulatory action is required regarding this issue.

**12. Waste Oil Sump, Underground Piping and Petroleum Releases in the Truck Maintenance Shop**

The two-foot by three-foot by two-foot deep sump has been clean and all waste oil residue removed. The sump is concrete lined and, therefore, is not a potential source of contamination to soil and/or groundwater.

The underground waste oil tank has been tested by a certified tank tester and has been certified as "tight." The tank is currently permitted by DEQ and complies with all federal and state underground storage tank laws. No further investigative work or regulatory action is required regarding this issue.

**13. Petroleum Release Northwest of the Engine Room (4.13, page 10)**

No visible or physical signs of soil staining or unauthorized releases of chemicals were observed during my September 6, 1994 inspection. No further action needed.

**14. Underground Diesel Tanks Formerly Located on the Cenex Property**

A report entitled "Phase II environmental Investigation Hydrocarbon Plume Delineation", dated April 19, 1994 shows that the fuel tank in question was removed in accordance with DEQ regulations and that soil and groundwater was not impacted. No further investigative work is required regarding this issue.

**CONCLUSION:**

If the investigative work described above is carried out in conjunction with your stormwater/gravel project, there should be no problems. Don Easley and I have discussed the sampling protocols that should be followed in performing this work. It is important that the data generated from any investigative work be properly collected and documented to demonstrate any future due-diligence. The work should cost between \$2 - 3,000.

If you have any questions, don't hesitate to call me.

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